

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Fort Worth Division**

OUTSOURCING FACILITIES
ASSOCIATION, et al.,

Plaintiffs,

v.

UNITED STATES FOOD AND DRUG
ADMINISTRATION, et al.,

Defendants.

Civil Action No. 4:24-cv-00953-P

Plaintiffs' Motion for Leave To Waive Local Counsel Requirement

Pursuant to Local Rule 83.10, Plaintiffs Outsourcing Facilities Association and North American Custom Laboratories, LLC, d/b/a FarmaKeio Custom Compounding file this motion for leave to proceed without local counsel.

1. Undersigned counsel is a member of the bar of the Northern District of Texas and has previously litigated matters in the District without local counsel, including in the Fort Worth Division. *See, e.g., Kulp v. Gamestop Corp*, Case No. 4:22-cv-00012-O.

2. Further, in recent years, the Baker Hostetler firm has opened a full Dallas office, located at 2850 North Harwood Street, Suite 1100, Dallas, TX 75201, and the undersigned regularly works there. Thus, in the event of a hearing on short notice, at minimum, at least one member of Plaintiffs' team would be able to appear in Fort Worth within a matter of 5-6 hours.

3. Counsel for Plaintiffs have reviewed the Local Rules for the Northern District of Texas and this Court's procedures and intend to abide by them. Accordingly, Plaintiffs request that the Court allow them to proceed in this matter without local counsel.

Dated: October 9, 2024

/s/ Ty Doyle

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* motion for pro vac vice admission
forthcoming

Attorneys for Plaintiffs

Certificate of Service

I hereby certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on October 9, 2024, and that I caused a copy of the foregoing, and all accompanying papers, to be served via email and via U.S. mail on the following:

United States Food and Drug Administration
10903 New Hampshire Ave.
Silver Spring, Maryland 20903

Dr. Robert M. Califf
10903 New Hampshire Ave.
Silver Spring, Maryland 20903

Dated: October 9, 2024

/s/ Ty Doyle

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